

Exhibit A
Traxxas, L.P. v. Hobbico, Inc., No. 2:16-cv-768-JRG-RSP (Lead Case)
Joint Claim Construction Chart¹²

AGREED TERMS

<u>Claim Term/Phrase</u>	<u>Agreed Construction</u>
“offset from the conveyance aperture” (’040 Patent, Claim 20)	“displaced in any direction from the conveyance aperture”
“portion of one or more one or more” (’763 Patent, Claim 17)	“portion of one or more”
“second clamping” (’040 Patent, Claim 31)	“second clamping surface”

DISPUTED TERMS

<u>Claim Term/Phrase</u>	<u>Traxxas’s Proposed Construction</u>	<u>Defendants’ Proposed Construction</u>
“chassis” (’951 Patent, Claims 27, 43)	<i>plain and ordinary meaning</i> <i>alternatively: “base frame”</i>	“a horizontally extending base frame of the vehicle that defines a longitudinal centerline for the vehicle and which provides a vertical reference for the spatial relationship between the

¹ The Hobbico Defendants join this pleading only insofar as it relates to the ’951, ’099, ’541, ’763 and ’539 Patents and only with respect to those claims that are asserted against the Hobbico Defendants. Plaintiff has not accused the Hobbico Defendants of infringing the ’040 Patent, or of infringing claims 5 or 18 of the ’763 Patent. The Hobbico Defendants therefore have no cause to consider the proper construction of, the need to construe or the proper construction of those terms in claims not asserted against them.

² The Firelands Group, LLC joins this pleading only insofar as it relates to the ’040, ’541, ’763 and ’539 Patents and only with respect to those claims that are asserted against it. Plaintiff has not accused The Firelands Group, LLC of infringing the ’951 or ’099 Patents, or of infringing claims 1-26 or claim 28 of the ’539 Patent. The Firelands Group, LLC therefore has no cause to consider the proper construction of, the need to construe or the proper construction of those terms in claims not asserted against it.

<u>Claim Term/Phrase</u>	<u>Traxxas's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
		transmission drive shaft and the steering control arm"
"chassis" ('099 Patent, Claims 1, 2, 6, 7, 13)	<i>plain and ordinary meaning</i> <i>alternatively: "base frame"</i>	"a horizontally extending base frame to which the wheel suspension spring and damper are mounted"
"adjacent" ('763 Patent, Claims 1, 16)	<i>plain and ordinary meaning</i> <i>alternatively: "next to" or "nearby"</i>	"next to, and not within, and having no intervening structure between"
"spaced apart from" ('539 Patent, Claims 1, 21, 27)	<i>plain and ordinary meaning</i>	"not touching any inner surface of the housing"
"mounted" ('539 Patent, Claims 1, 2, 11, 12, 21)	<i>plain and ordinary meaning</i>	"securely affixed or fastened"
"movable" ('541 Patent, Claim 1)	<i>plain and ordinary meaning</i>	"first clamp surface can move independently of the uncoupled enclosure members"
"electrically coupled" ('539 Patent, Claims 1, 12, 21, 27)	<i>plain and ordinary meaning</i>	"rigid metal conductor electrically connecting the circuit board to the light source"
"one or more wires separated from immediate surroundings and preventing passage of contaminants past or between the one or more wires" ('040 Patent, Claim 20; '541 Patent, Claims 1, 12)	<i>plain and ordinary meaning</i>	"one or more separate and distinct wires, not including a bundle of wires, and preventing passage of contaminants between the one or more separate and distinct wires"
"resiliently deformable material" ('763 Patent, Claim 4)	<i>plain and ordinary meaning</i>	"flexible material capable of changing shape and returning to the original shape"
"one of more flexible surfaces" ('541 Patent, Claim 2)	"one or more flexible surfaces"	<i>Indefinite for lack of antecedent basis</i>
"foot members"	<i>plain and ordinary meaning</i>	<i>Indefinite for lack of antecedent basis</i>

<u>Claim Term/Phrase</u>	<u>Traxxas's Proposed Construction</u>	<u>Defendants' Proposed Construction</u>
('763 Patent, Claim 18)		
"relatively farther" ('040 Patent, Claim 20; '541 Patent, Claim 1)	<i>plain and ordinary meaning</i>	<i>Indefinite</i>